

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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BMO HARRIS BANK N.A.	:
	: Case No. 1;20-cv-1486-RPK-VMS
Plaintiff,	:
	:
-against-	: STATUS REPORT OF
	: COMMUNICATION BETWEEN
PRIDE EXPRESS, LLC, and	: PLAINTIFF AND
MIRIAN BLANCO,	: DEFENDANTS
	:
Defendants.	:
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Daniel P. Jaffe, Of Counsel of Husch Blackwell LLP, hereby files this Status Report to the Court as follows:

1. The undersigned, Daniel P. Jaffe, is attorney of record for Plaintiff BMO Harris Bank N.A. in the above captioned matter.
2. Pursuant to the Court's SCHEDULING ORDER of July 9, 2020, and in preparation for Court's Telephone Conference of September 1, 2020, the undersigned states as follows.
 - a. The undersigned telephoned the defendants, Pride Express, LLC and Mirian Blanco ("the Defendants") by telephoning Mirian Blanco on her mobile telephone number (646-400-7856) at approximately 11:40 A.M. on September 1, 2020. The following communications occurred during this telephone call.
 - b. The person answering the telephone confirmed that she was Mirian Blanco ("Defendant Blanco") and that her address was 89 07 169th Street, Apartment 4B, Jamaica, New York 11432.

- c. The undersigned identified himself as the attorney for BMO Harris Bank N.A. in the lawsuit involving the truck Defendants purchased.
- d. Defendant Blanco acknowledged that she was involved in this transaction.
- e. Defendant Blanco told the undersigned she barely understands English and that she has been sick in the hospital for the past six weeks.
- f. The undersigned told her that the Telephone Conference scheduled for 12:30 P.M. on September 1, 2020 had been re-scheduled to 1:00 P.M. on this same date. Defendant Blanco told me her son would call me back, but did not specify when. The implication was that her son was fluent in English.

3. Subsequent to the Court's Telephone Conference of September 1, 2020 which commenced at approximately 1:10 P.M. on that date and subsequent to the Court's September 1, 2020 SCHEDULING ORDER which scheduled a Telephone Conference for September 10, 2020 at 3:30 P.M., the following communications between the undersigned and the Defendants took place:

- a. Just before 2:00 P.M. on September 1, 2020, the undersigned received a call from a person identifying himself as Santos Blanco, the son of Marian Blanco, the named defendant in this case. Santos Blanco gave me the following information during this telephone call:
 - 1) The email address for Santos Blanco is blancosantos55@icloud.com.
 - 2) He possesses and uses the subject truck that BMO Harris Bank N.A. financed for Pride Express, LLC, the business he operates.
 - 3) He agreed that BMO Harris Bank N.A. and Defendants should try to settle [the above captioned] case.

b. During the afternoon of September 3, 2020, the undersigned received a second telephone call from Santos Blanco and the following communications and actions took place:

- 1) Santos Blanco told the undersigned that both he and his mother, defendant Marian Blanco, are officers of Pride Express, LLC, and that both of them are authorized to speak for Pride Express, LLC.
- 2) Santos Blanco agreed that he and his mother will attend the Court telephone conference set for September 10, 2020 at 3:30 PM.
- 3) Santos Blanco agreed that he will act as an interpreter-translator for his mother at the Court telephone conference set for September 10, 2020 at 3:30 PM. since she has indicated that she is not comfortable in communicating in English.
- 4) Santos Blanco confirmed that he had received the undersigned's September 2, 2020, email sent to his email address: blancosantos55@icloud.com and that this is a good email address with which to communicate with him.
- 5) Santos Blanco confirmed that 646-400-7856 is a good and functioning telephone number with which to communicate with him and his mother.
- 6) Santos Blanco agreed that he on behalf of Pride Express, LLC ("Pride Express"), and his mother are willing to engage in good faith settlement negotiations with BMO Harris Bank N.A. ("BMO") to attempt to resolve the above captioned case on terms acceptable to BMO, and Pride Express and Marian Blanco.

- 7) Santos Blanco indicated that he understood that the undersigned is the New York attorney for BMO Harris Bank N.A. who has filed this lawsuit against his mother and Pride Express, LLC, and that at this time the undersigned has no authority to make any offers or demands for settlement on behalf of BMO Harris Bank N.A.
- 8) On September 3, 2020, the undersigned sent an email to Santos Blanco to his email address, blancosantos55@icloud.com, forwarding the Court's September 1, 2020 SCHEDULING ORDER which scheduled a Telephone Conference for September 10, 2020 at 3:30 P.M.

The undersigned, Daniel P. Jaffe, states that the foregoing is true and accurate to the best of his knowledge, information and belief.

Dated: New York, New York
September 4, 2020

HUSCH BLACKWELL LLP

By: /s/ Daniel P. Jaffe
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CERTIFICATE OF SERVICE

I hereby certify that I served defendants Marian Blanco and Pride Express, LLC by sending an email to Santos Blanco at blancosantos55@icloud.com on the date the foregoing document was filed on the CM/ECF system,

/s/ Daniel P. Jaffe
Daniel P. Jaffe